

EXHIBIT 1

**Cavness – Privilege log
Timeline of Events**

DATE	DESCRIPTION
November 7, 2014	Plaintiff Counsel Blankenship emails Defense Counsel to request, per rule 193.3(b), identification of withheld material. (Ex. 2)
November 24, 2014	Ethicon sends DVDs and cover letter containing their privilege log. (Ex. 3)
December 5, 2014	Plaintiff Counsel emails letter to Defense giving notice of intent to request a hearing if they do not withdraw assertions of privilege on 1,570 identified documents, also indicates intention to file a Notice of Deposition for corporate rep. (Ex. 4)
December 15, 2014	Notice of hearing sent to Defense setting hearing for Jan. 6, 2015. (Ex. 5)
December 19, 2014	Plaintiff Counsel Freese and Defense counsel Jones have a call over the privilege log and proposed notice of deposition of corporate representative.
December 20, 2014	Plaintiff Counsel Freese and Defense Counsel Jones exchange emails regarding whether there has been a meet and confer, a phone conference is proposed. (Ex. 6)
December 29, 2014	Plaintiff amends her notice of hearing, rescheduling for Jan 21, 2015. (Ex. 7)
December 30, 2014	Ethicon sends via email their first response to production which includes 1100 duplications and a list of 124 documents for which privilege was withdrawn. Actual documents are not sent. (Ex. 8)
January 5, 2015	Defense requests parties jointly propose requesting coordination, and seek telephone conference to discuss on Jan 6, 2015. (Ex. 9)
January 6, 2015	Defense sends email update stating that Ethicon has almost finished privilege review and that they will transmit documents the following day. Defense also memorializes agreement that in exchange for Plaintiff's agreement to

extend time for privilege claim, Defendant will hold off on sending request for coordination. (Ex. 10)

January 7, 2015 Defense emails the final list of downgrades and transmits the produced documents. In total, 1178 documents were duplicates, 218 were withdrawn as privileged, and 125 were withheld as privileged. (Ex. 11)

January 8, 2015 Defense advises that they have made best efforts to narrow down the remaining documents and seeks Plaintiff's position. (Ex. 12)

January 13, 2015 Plaintiff expresses her opinion on the privilege asserts by sending a second amended notice of hearing, requesting in camera inspection for the remaining documents for which privilege is asserted. (Ex. 13)

January 16, 2015 Defense seeks an extension on filing their "papers" and requests a continuance of the Feb. 3rd hearing. (Ex. 14).

January 20, 2015 Plaintiff agrees to again move the hearing date.

January 23, 2015 Plaintiff's Counsel Goss emails Defense Counsel that they have the new hearing date, requesting a date for deposition of a corporate witness, and seeking an agreement on a process with respect to a process for production or claim privilege on the remaining 20k documents in the privilege log. (Ex. 15, p.6)

January 23, 2015 To accommodate Defense, a Third amended notice of hearing is sent, changing the hearing from Feb 3 to Feb 17. (Ex. 16)

January 30, 2015 Plaintiff Counsel Goss responds to Defense request for "meet and confer" that without evidence supporting privilege assertions, Plaintiff cannot decide on necessity of corporate representative deposition. (Ex. 15, p. 3)

January 30, 2015 In response to Defense request, Plaintiff Counsel Goss requests specificity on how many of the 20k documents are duplicates and number of documents for which privileges are at issue. (Ex. 15, p. 1-2)